

Exhibit 14

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,
Plaintiff,

Court File No. 16-cv-1054 (WMW/DTS)

v.

FEDERAL INSURANCE COMPANY,
an Indiana corporation,
Defendant.

**FEDERAL INSURANCE COMPANY'S
SECOND SUPPLEMENTAL ANSWER
TO INTERROGATORY NO. 6 AND
SUPPLEMENTAL ANSWER TO
INTERROGATORY NO. 21**

To: Plaintiff and its attorneys, Allen Hinderaker and Michael A. Erbele, Merchant & Gould PC, 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Second Supplemental Answer to Interrogatory No. 6, and Supplemental Answer to Interrogatory No. 21, states and alleges as follows:

GENERAL RESPONSES

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to

amend, supplement, or change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

3. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 6: Identify all Persons known to you to have knowledge of Federal’s revenues and profits, including the revenues and profits, if any, attributable to the use of the Blaze Advisor® software by Chubb & Son, a division of Federal.

SECOND SUPPLEMENTAL ANSWER: Federal objects to this Interrogatory because it seeks information that is not relevant. Federal’s profits are not reasonably related to the alleged infringement, as is necessary for FICO to obtain an award of the defendant’s profits. *See, e.g., Francois v. Ruch*, 2006 WL 3735950, at *3 (C.D.Ill. Dec. 15, 2006).

Subject to, and without waiving this objection, Federal states that revenues earned on the sale of insurance are not attributable to use of the Blaze Advisor® software. Federal identifies John Taylor as a person with general knowledge of revenues and profits for Federal and its subsidiaries and entities that use the Blaze Advisor® software.

INTERROGATORY NO. 21: From March 30, 2016 to date, identify and describe each instance in which the Blaze Advisor® software was modified in any way – whether by Chubb & Son, a division of Federal, Federal, or any other entity or person.

SUPPLEMENTAL ANSWER: Federal objects to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of the case in seeking “each instance” of any modification to the Blaze Advisor® software. Federal further

objects to this Interrogatory as vague and overbroad because such information relating to the modification of Blaze Advisor® software has no bearing on the claims and defenses in this action. Federal further objects to this Interrogatory as vague and ambiguous in referring to software that is “modified in any way.” Federal further objects to the extent the Interrogatory seeks information not in the possession, custody, or control of Federal, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Federal states that from March 30, 2016 to the present, the Blaze Advisor® software was never modified in any way by Chubb & Son, a division of Federal, Federal, or any other associated entity or person.

Dated: June 7, 2018

/s/ Terrence J. Fleming
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VERIFICATION

Henry Mirolyuz states under oath that he is a Senior Systems Architect at Chubb Insurance; that he is authorized to respond to Fair Isaac Corporation's Interrogatories on behalf of Federal Insurance Company; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answers to interrogatories; and that the answers are true and correct to the best of his knowledge.

Subscribed and sworn to before me
this _____ day of _____, 20____.

Notary Public

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